

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA,

v.

AMINEE JEWEL DAVENPORT

Defendant.

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Case Nos.: 7:19-mj-00081

**MOTION TO MODIFY PRETRIAL RELEASE CONDITIONS**

COMES NOW the defendant, Aminee Jewel Davenport, by counsel, and moves this Court for an Order pursuant to 18 U.S.C. § 3161 (h)(7)(A) continuing this matter from April 7, 2021, to a mutually agreeable date set by the Court and states the following in support of this request:

- (1) Defendant is charged with several counts of conspiracy and possession with intent to distribute a schedule I/II substance.
- (2) A jury trial is scheduled for April 7, 2021.
- (3) Counsel for defendant needs additional time to adequately prepare this case for trial. Discovery is voluminous, ongoing, and counsel needs additional time to review with defendant prior to the trial in this matter. Counsel for defendant and the United States also need additional time for plea negotiations. Defendant agrees to waive the protections afforded her under the Speedy Trial Act.
- (4) This requested continuance is warranted under 18 U.S.C. § 3161(h)(7)(A) to meet the ends of justice as the defendant's interest in additional time to prepare outweighs her and the public's interest in a speedy trial and denial of this request would deprive the defendant of the reasonable time needed to prepare for trial. Defendant agrees

the delay attributable to this request for this continuance shall be excluded in computing the time within which the trial must commence under the Speedy Trial Act.

(5) The United States has been consulted and has no objection to this Motion for Continuance based on the above referenced grounds and the ends of justice.

WHEREFORE, defendant, by counsel, respectfully request this court grant this Motion for Continuance of the trial in this matter.

Respectfully submitted,

AMINEE JEWEL DAVENPORT

/s/ **Robert E. Dean**

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By Counsel

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*Counsel for the Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of March, 2021, the foregoing was filed electronically and notice sent to the following parties by operation of the Court's electronic filing system:

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*Counsel for the United States*

**/s/ Robert E. Dean**

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